

# ADEQ MINOR SOURCE AIR PERMIT

Permit No. : 2055-AR-1

IS ISSUED TO:

Watson Sawmill, Inc. / Watson Lumber Company  
Mount Holly, AR 71758  
Union County  
AFIN: 70-00004

THIS PERMIT IS WATSON SAWMILL, INC. / WATSON LUMBER COMPANY'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Michael Bonds  
Chief, Air Division

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Date

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### **List of Acronyms and Abbreviations**

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter Smaller Than Ten Microns
SO <sub>2</sub>	Sulfur Dioxide
tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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**Section I: FACILITY INFORMATION**

PERMITTEE: Watson Sawmill, Inc. / Watson Lumber Company

AFIN: 70-00004

PERMIT NUMBER: 2055-AR-1

FACILITY ADDRESS: 170 Mill Road  
Mount Holly, AR 71758

MAILING ADDRESS P.O. Box 70  
Mount Holly, AR 71758

COUNTY: Union

CONTACT POSITION: Jamie Wyrick, Controller

TELEPHONE NUMBER: (870) 554-2466

REVIEWING ENGINEER: Karen Cerney

UTM North South (Y): Zone 15: 3683.638

UTM East West (X): Zone 15: 504.613

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## **Section II: INTRODUCTION**

### **Summary of Permit Activity**

Watson Sawmill, Inc. / Watson Lumber Company operates a hardwood sawmill in Mount Holly. This permitting action allows the facility to increase the production rates for the Debarker (SN-01), Rough Cut Sawmill (SN-02), Planing Mill (SN-05), and the Drying Kilns (SN-07 and SN-08), and it also allows for the addition of two new Drying Kilns (SN-09 and SN-10) to the facility. This permitting action allows an increase in PM emissions by 21.9 tons per year (tpy), PM<sub>10</sub> emissions by 16.8 tpy, and VOC emissions by 5.6 tpy with this modification.

### **Process Description**

At Watson Sawmill, Inc. / Watson Lumber Company, the primary products are “rough-cut” lumber and kiln-dried lumber and beams. There are three by-products. The first is bark which is collected and sold. The second is a mixture of green (moist) sawdust and wood chips. The third is a mixture of dry shavings and sawdust. The sawdust and wood chips are used as fuel for the boiler.

Raw logs are brought to the property by truck, weighed and then unloaded onto a wood pile. The logs are loaded onto the conveyor and fed into the Debarker (SN-01). The Debarker removes the bark from the logs. The waste bark from the Debarker is sent by conveyor belt to the Chip Handling Pile (SN-04). The bark is then loaded up into the trucks and removed from the facility.

The debarked logs then head to the Rough Cut Sawmill (SN-02). The sawmill cuts the logs into the desired size and sends them for sorting and bundling. The sawdust from the sawmill is collected and sent by conveyor to the Sawdust Handling Pile (SN-03). This sawdust is collected and used as fuel in the Boiler (SN-06).

Some of the lumber will be stacked on sticks and sent to dry outside for 90-120 days. Then it is sent to the Drying Kilns (SN-07, SN-08, SN-09, and SN-10) for approximately 6 days. After it had reached the correct moisture content, it is removed from the drying kilns. It will be stored until it is ready to be processed in the Planing Mill (SN-05). The emissions from the planing mill are sent through a cyclone system. All dust collected from the cyclone will be used as fuel for the boiler.

Finished lumber will be stacked into packages and stored until it is ready for delivery to a customer.

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### Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective February 15, 1999
40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

### Total Allowable Emissions

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	40.6	52.6
PM <sub>10</sub>	27.4	38.1
SO <sub>2</sub>	0.3	1.3
VOC	2.2	8.1
CO	7.2	31.5
NO <sub>x</sub>	2.6	11.6
Acrolein	0.05	0.21
Benzene	0.05	0.22
Chlorine	0.01	0.04
Formaldehyde	0.05	0.23
Hydrogen Chloride	0.23	1.00
Styrene	0.02	0.10
Arsenic	0.01	0.01
Lead	0.01	0.01
Manganese	0.02	0.08
Total HAPs	0.45	1.9

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### **Section III: PERMIT HISTORY**

2055-A was the initial permit for the facility, as levels of particulate emissions were expected to exceed the 10 tons per year (tpy) of PM<sub>10</sub> and the 15 tpy of PM that made a permit mandatory. Actual emissions from this facility prior to installation of the boiler and the planing mill were below the permitting threshold. Once the boiler (SN-06) and planing mill (SN-05) were installed the facility was above the permitting threshold for PM<sub>10</sub> and PM. Throughput limits on annual production limited emissions to 30.7 tpy of PM, 21.3 tpy of PM<sub>10</sub>, 1.3 tpy of SO<sub>2</sub>, 2.5 tpy of VOC, 31.5 tpy of CO, 11.6 tpy of NO<sub>x</sub>, and 1.9 tpy of HAPs.

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#### **Section IV: EMISSION UNIT INFORMATION**

##### **Source No. SN-01 through SN-05 Description**

Logs are loaded onto a conveyor and fed into the Debarker (SN-01). The Debarker removes the bark from the logs and sends it by conveyor belt to the Chip Handling Pile (SN-04). The debarked logs then head to the Rough Cut Sawmill (SN-02). The sawmill cuts the logs into the desired size and sends them for sorting and bundling. The sawdust from the sawmill is collected and sent by conveyor to the Sawdust Handling Pile (SN-03). The lumber will be stored until it is ready to be processed in the Planing Mill (SN-05). The emissions from the planing mill are sent through a cyclone system.

##### **SN-01 through SN-05 Specific Conditions**

1. The permittee will not exceed the emission rates set forth in the following table. Compliance with these emission rates are demonstrated by compliance with Specific Condition #4. [Regulation 19, §19.501 *et seq.*, effective February 15, 1999 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

<b>SN</b>	<b>Description</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
01	Debarker	PM <sub>10</sub>	0.6	0.7
02	Rough Cut Sawmill	PM <sub>10</sub>	11.0	12.5
03	Sawdust Handling	PM <sub>10</sub>	2.3	1.9
04	Chip Handling	PM <sub>10</sub>	0.3	0.3
05	Planing Mill	PM <sub>10</sub>	10.8	12.2

2. The permittee will not exceed the emission rates set forth in the following table. Compliance with these emission rates are demonstrated by compliance with Specific Condition #4. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

<b>SN</b>	<b>Description</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>tpy</b>
01	Debarker	PM	1.1	1.3
02	Rough Cut Sawmill	PM	19.3	21.9
03	Sawdust Handling	PM	6.5	5.3
04	Chip Handling	PM	0.3	0.3
05	Planing Mill	PM	10.8	12.2



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3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

<b>SN</b>	<b>Limit</b>	<b>Regulatory Citation</b>
01	20%	§19.503
02	20%	§19.503
03	20%	§19.503
04	20%	§19.503
05	10%	§18.501

4. The permittee will not process more than 130,050 tons of hardwood at the Debarker, SN-01, per consecutive 12-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #4. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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### Source No. SN-06 Description

Sawdust and wood chips from the sawmill are collected and used as fuel in the Boiler (SN-06). The boiler is rated at 250 hp. The emissions from the boiler are sent through a multi-clone system.

### SN-06 Specific Conditions

6. The permittee will not exceed the emission rates set forth in the following table. Compliance with these emission rates are demonstrated by compliance with Specific Condition #9. [Regulation 19, §19.501 *et seq.*, effective February 15, 1999 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
06	Wood Waste Fired Boiler with Multi-clone	PM <sub>10</sub>	2.4	10.5
		SO <sub>2</sub>	0.3	1.3
		VOC	0.2	0.9
		CO	7.2	31.5
		NO <sub>x</sub>	2.6	11.6

7. The permittee will not exceed the emission rates set forth in the following table. Compliance with these emission rates are demonstrated by compliance with Specific Condition #9. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
06	Wood Waste Fired Boiler with Multi-clone	PM	2.6	11.6
		Acrolein	0.05	0.21
		Benzene	0.05	0.22
		Chlorine	0.01	0.04
		Formaldehyde	0.05	0.23
		Hydrogen Chloride	0.23	1.00
		Styrene	0.02	0.10
		Arsenic	0.01	0.01
		Lead	0.01	0.01
		Manganese	0.02	0.08

8. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
06	10%	§18.501

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9. The permittee will use only sawdust and woodchips to fuel the boiler. The permittee will not use more than 11,680 tons of sawdust and woodchips per consecutive 12-month period to fuel the boiler. [Regulation No. 19 §19.705 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
10. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #9. Compliance will be determined on a monthly basis by totaling the tons of sawdust and woodchips used to fuel the boiler for the previous 12 months. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

**NSPS Conditions**

11. SN-06 is subject to 40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The permittee will comply with all applicable regulations under 40 CFR Part 60, Subpart Dc. Requirements of this subpart for this facility include, but are not limited to, the following: 40 CFR 60.48c (g): records of the amount of fuel combusted for source SN-06 and 40 CFR 60.48c (i) maintaining these records for two years. The permittee is required to keep records of the fuel combusted each day by the wood-fired boiler and to maintain those records for at least two years. These records will be updated by noon of the day following the day to which the records pertain. These records will be kept on site and made available to Department personnel upon request. [§19.304 of Regulation 19 and 40 CFR 60, Subpart Dc]
12. The permittee will test the boiler while the source is operating at or above 90% of rated capacity using EPA Reference Methods 201A and 202 for PM<sub>10</sub>. These tests will be performed in accordance with General Condition #7. If the facility passes the PM<sub>10</sub> tests, the tests will then be repeated once every five years. Failure of any test will require the permittee to repeat the testing every other year. Test results will be maintained on-site, made available to Department personnel upon request, and will be submitted to the Department in accordance with General Condition #7. [Regulation No. 19 §19.702 and 40 CFR Part 52, Subpart E]
13. The permittee will perform a one time test of the boiler while the source is operating at or above 90% of rated capacity using EPA Reference Method 10 for CO. This test will be performed in accordance with General Condition #7. Test results will be maintained on-site, made available to Department personnel upon request, and will be submitted to the Department in accordance with General Condition #7. [Regulation No. 19 §19.702 and 40 CFR Part 52, Subpart E]

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### Source No. SN-07 through SN-10 Description

Some of the lumber will be stacked on sticks and sent to dry outside for 90-120 days. Then it is sent to the Drying Kilns (SN-07, SN-08, SN-09 and SN-10) for approximately 6 days. After it has reached the correct moisture content, it is removed from the drying kilns.

### SN-07 and SN-08 Specific Conditions

14. The permittee will not exceed the emission rates set forth in the following table. Compliance with these emission rates are demonstrated by compliance with Specific Condition #15. [Regulation 19, §19.501 *et seq.*, effective February 15, 1999 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
07 through 10	Drying Kilns	VOC	2.0	7.2

15. The permittee will not process more than 14,000,000 board feet of lumber at the drying kilns (SN-07 through SN-10) per consecutive 12-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
16. The permittee will maintain monthly records which demonstrate compliance with Specific Condition #15. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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### **Plant Wide Conditions**

17. The permittee will not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  
18. The permittee will not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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### **Section V: INSIGNIFICANT ACTIVITIES**

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated November 20, 2003.

<b>Description</b>	<b>Category</b>
Kiln Burners (Four 2 MMBtu/hr each)	A-1

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## Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee will notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Regulation 19, §19.704 and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19, §19.410(B) and/or Regulation 18, §18.309(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
Post Office Box 8913

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Little Rock, AR 72219

7. The permittee will test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee will provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. Sampling ports adequate for applicable test methods
  - b. Safe sampling platforms
  - c. Safe access to sampling platforms
  - d. Utilities for sampling and testing equipment
9. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Regulation 19, §19.303 and/or Regulation 18, §18.1104 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19, §19.601 and/or Regulation 18, §18.1101 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
  - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
  - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such



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conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.

11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
  - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
  - c. To inspect any monitoring equipment or monitoring method required in this permit;
  - d. To sample any emission of pollutants; and
  - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19, §19.410(A) and/or Regulation 18, §18.309(A) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated '8 1 106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Regulation 19, §19.407(B) and/or Regulation 18, §18.307(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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17. This permit supersedes and voids all previously issued air permits for this facility.  
[Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]

## **APPENDIX A**